

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION

KARLA M. VASQUEZ, individually)  
and as Parent, Next Friend, Natural )  
and General Guardian of Aaron )  
Vasquez, )

Plaintiffs, )

v. )

PICKENS COUNTY; PICKENS )  
COUNTY SHERIFF'S )  
DEPARTMENT; RICK CLARK, )  
PICKENS COUNTY SHERIFF; )  
JAMES WILLIAM TROTTER, )  
MATT MCGAHA; CHIEF )  
DEPUTY CHUCK JAMES; )  
LIENTENANT TOMMY )  
BLANKENSHIP )

Defendants. )

CA No. 8:22-cv-02641-DCC-KFM

**DEFENDANTS' EXPERT WITNESS  
DISCLOSURE PURSUANT TO  
FED. R. CIV. P. 26(A)(2)**

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**TO: PLAINTIFF AND ALL COUNSEL OF RECORD**

Pursuant to FED. R. CIV. P. 26(A)(2) of this Courts Second Amended Scheduling  
Order, Defendants identify the following experts:

1. Michael A. Brave, Esquire, M.S.  
2036 North Gilbert Road, Suite 2-625  
Mesa, Arizona 85203  
(651) 963-3399  
[brave@laaw.com](mailto:brave@laaw.com)

Michael Brave, J.D., M.S. (trainer, consultant, attorney, retired officer), has a wide  
range of law enforcement experience, including: earning instructor certifications in many  
force options, vehicle operations, pursuits, and others; authoring 140+ papers, book  
chapters, videos, and webinars; involved in 750+ legal actions; retained as an expert in

280+ federal/state civil rights issues, international inquests, and others; involved in reviewing 650+ Officer-Associated Deaths (O-ADs); and presented on force and other subjects 1000+ times in the U.S.A., Mexico, U.K., Canada, Austria, and Panama. He serves as Legal Advisor and a Board Member to International Law Enforcement Educators and Trainers Association (ILEETA). He is an International Association of Directors of Law Enforcement Standards and Training (IADLEST) International Certified Instructor and Nationally Certified Instructor. He is a Life Member of the International Association of Chiefs of Police (IACP), American Jail Association (AJA), National Sheriffs Association (NSA), and others. Mr. Braves' Curriculum Vitae is attached herewith.

Mr. Brave has been retained by Defendants to provide his opinion with regard to the use of force used by Officer Trotter, the taser deployment, and law enforcement standards with regard to this particular incident. Mr. Brave will testify consistent with his report and the evidence of the case. Mr. Brave will provide his testimony regarding his review of any and all investigative reports, discovery documents, medical records, cited authorities in his report, or any documents produced through the course of discovery.

Defendants expressly reserve the right to elicit expert testimony from any individual named as an expert by other parties to this case. Defendants further reserve the right to supplement this disclosure at a later time should the case develop in such a way to warrant additional expert testimony on Defendants' behalf. Defendants further reserve the right to expert testimony from any medical care providers discovered through Plaintiff's medical records, obtained either in discovery or through subpoena, at a later date.

(Signature block on following page)

THE WARD LAW FIRM, P.A.  
Attorney for James William Trotter

s/ Chad M. Graham

Chad M. Graham (Federal Bar #: 11569)

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